



**BP EXPLORATION**

BP Exploration Inc.  
P.O. Box 4587  
Houston, Texas 77210-4587

BP Plaza  
200 WestLake Park Boulevard  
Houston, Texas 77079

(713) 560-8500

September 10, 1997

**received**  
**9-17-97** VHB

Department of the Interior  
Minerals Management Service  
Mail Stop 4700  
381 Elden Street  
Herndon, Virginia 20170-4817  
Attention: Rules Processing Team

Gentlemen:

Thank you for the opportunity to comment on the Proposed Rule for "Blow-out Preventer Testing Requirements for Drilling and Completion Operations" (Federal Register/ Vol. 62, No. 135/ Tuesday, July 15, 1997). In the following paragraphs are our comments on the six areas for which comment was requested in the Federal Register: 1) 14-Day BOP Testing Timeframe; 2) Test Pressures; 3) Duration of BOP Pressure Test; 4) BOP Testing at Casing and Liner Points; 5) Weekly Actuation of Annular and Rams; 6) Format of the Proposed Rule.

We remain anxious to work with MMS in continuing efforts to improve the integrity of operations in the OCS. Please continue to call on us if we can be of assistance.

1) 14-Day BOP Testing Timeframe

We agree with the proposed rule as discussed. Based on experience in our operations since the NTL extending test intervals was issued in February of 1997 we have not seen any increase in failure frequency during testing or operations. We will continue to perform testing and document tests as we did during the study period of 1996.

2) Test Pressures

We do not feel that changing test pressure requirements to a MASP basis will improve the reliability of BOPE if the common definition of MASP is used (MASP = Leakoff pressure at the exposed weak point - Mud hydrostatic at the weak point). This method does not compute the higher pressures that are a distinct possibility in the event of a gas kick, lost returns or migration of a gas influx up the well bore until the time the pressure can be managed by volumetric or conventional well kill methods. However, we feel that testing to the rated working pressure of the BOPE can be excessive and pressure testing should be related to the kick design integrity of the well. Current BP practice, where local regulations do not require higher test pressures, is to test to the lesser of 80% of the upper hole casing burst integrity, the well head pressure rating or the BOPE working pressure rating (limited to 70% for annular preventers).

3) Duration of BOP Pressure Test

We feel that the 5 minute test interval for large BOPE such as blow-out preventers should be continued because of the larger fluid volumes used for testing and leak detection. In the case of smaller volume components such as valves in the choke manifold where long runs of piping are not involved a 3 minute test at the stabilised maximum test pressure is acceptable.

4) BOP Testing at Casing and Liner Points

We support the proposed rule as written.

5) Weekly Actuation of Annular and Rams

We support the proposed rule as written.

6) Format of the Proposed Rule

We appreciate the effort made to communicate the proposed rule in "plain English" format. This should facilitate understanding, compliance and communication within the operating companies and with the MMS.

Sincerely,



W.D. Harris  
Exploration Drilling Manager

cc:

R.K. Guerre  
B.C. Smolen